

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
Case No. 1:17-CV-184 (CCE) (LPA)**

BARRY HONIG, an individual,

Plaintiff,

v.

ROBERT LADD, an individual; MGT
CAPITAL INVESTMENTS, INC., a
Delaware corporation; TERI BUHL,
an individual; and DOES 1-20,

Defendants.

**DECLARATION OF TERI BUHL
IN SUPPORT OF RULE 12(b)(2)
MOTION TO DISMISS THE
COMPLAINT FOR LACK OF
PERSONAL JURISDICTION**

I, Teri Buhl, pursuant to 28 U.S.C. § 1746, declare the following to be true and correct to the best of my knowledge and, if asked to do so, I could and would competently testify as to these facts:

1. I am named as a defendant in the above-captioned action. I make this declaration in support of my Motion to Dismiss the Complaint for lack of personal jurisdiction pursuant to Federal Rule of Civil Procedure 12(b)(2).
2. I am a citizen and resident of the City of New York in the State of New York.
3. I have resided in New York, New York since the middle of 2015.
4. Prior to 2015, I resided in New Canaan, Connecticut for ten years.
5. I have never maintained a residence in the State of North Carolina.
6. I have never owned any real property in the State of North Carolina.
7. I have never had any office in the State of North Carolina.

8. I have never maintained any bank accounts in the State of North Carolina.
9. I have never had any telephone listing in the State of North Carolina.
10. I have never filed state income tax returns in the State of North Carolina.
11. I have never sold any goods or performed any services in the State of North Carolina.
12. I have never traveled to the State of North Carolina to sell goods or services.
13. I have never traveled to the State of North Carolina to solicit business.
14. I have never traveled into the State of North Carolina (for any purpose) except on a single occasion when I travelled through the Raleigh-Durham Airport approximately two years ago while en route to a destination outside of North Carolina for a vacation.
15. I am an investigative journalist with a particular focus on the financial industry.
16. I have contributed to a number of news and industry trade publications, including the New York Post, Forbes Magazine, Fortune Magazine, Hearst Newspapers, and The Atlantic.
17. I also report for a publication called Growth Capitalist, which is operated by the media company, Market Nexus Media.
18. Since 2010, I have operated and written content for teribuhl.com, a website that offers commentary on business deals and financial transactions.

19. From 2010 until 2013, I operated the website teribuhl.com from the State of Connecticut.

20. From 2013 to present, the business of teribuhl.com has been conducted in the State of New York.

21. The articles attached as Exhibits A and C through F to the Complaint in the above-captioned action and which Plaintiff refers to as the “Defamatory Articles” were all drafted, researched, and investigated from New York.

22. None of the articles attached as Exhibits A and C through F to the Complaint in the above-captioned action and which Plaintiff refers to as the “Defamatory Articles” were drafted, researched, or investigated from North Carolina.

23. I never travelled to North Carolina in connection with the drafting, research, or investigation of the articles attached as Exhibits A and C through F to the Complaint in the above-captioned action (which Plaintiff refers to as the “Defamatory Articles”).

24. I never placed or a received a telephone call to a North Carolina phone number in connection with the drafting, research, or investigating of the articles attached as Exhibits A and C through F to the Complaint in the above-captioned action (which Plaintiff refers to as the “Defamatory Articles”).

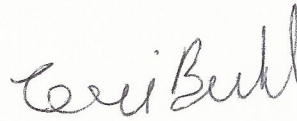
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I declare under penalty of perjury that the foregoing statements are true and correct.

Dated: June 30, 2017

Executed at New York County

State of New York

A handwritten signature in cursive script, appearing to read "Teri Buhl", written above a horizontal line.

Teri Buhl

CERTIFICATE OF SERVICE

I hereby certify that on July 5, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send email notification of such filing to the following:

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This the 5th day of July, 2017.

/s/ Erica A. Wolff
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